

7020

February 2, 1994

Ms. Janet Miller
Ohio Environmental Protection Agency
Northwest District Office
P.O. Box 466
Bowling Green, OH 43402-0466

Subject: RCRA Closure Plans/NASA Plum Brook Station

I am writing to transmit a closure plan for a waste accumulation area at Plum Brook Station and to describe NASA's proposed procedures for implementing additional closures.

BACKGROUND

We spoke on September 29, 1993, about certain underground storage tanks (UST's) removed from NASA's Plum Brook Station (PBS) located near Sandusky. I asked what procedures were necessary for closing these sites, which in the past had stored wastes listed under the Resource Conservation and Recovery Act (RCRA) as hazardous. You said that although PBS is considered a generator-only facility, a closure plan should be submitted under the Ohio Administrative Code (OAC) Section 3745-66-12 as, during the 1980's, the tanks may have stored RCRA hazardous wastes for periods exceeding 90 days.

The UST's in question were removed in 1989 according to requirements of the Bureau of Underground Storage Tank Regulation (BUSTR). When nonfuel contaminants were found at the sites, BUSTR stated that the Ohio EPA would have jurisdiction over any remedial action. NASA communicated with Ohio EPA NWDO regarding the sites (see enclosed letter to Mr. Bruce Dunlavy dated October 16, 1990) and was told that Ohio EPA would not review or comment on the plans (see enclosed letter from Mr. Todd Kelleher dated November 5, 1990).

A Phase 1 study of the sites was undertaken by Ebasco Services and completed in November 1991. It was determined that significant additional information was required, and a Preliminary Site Investigation was conducted in 1992 and completed in January 1993 by MK-Ferguson. We were prevented from contacting Ohio EPA regarding the results of this study until our conversation in September due to potential litigation and the desire of attorneys representing the State and NASA to have all contacts go through the respective attorneys.

CONCUR	CODE →	7022/BION/DFE				
	SIGNATURE →	<i>DFE</i>				
	DATE →	2-2-94				

TANK AREAS IN QUESTION

The UST's being addressed here include three discrete areas:

<u>Area</u>	<u>UST Numbers</u>
Reactor	21, 22, 23
Space Power Facility	24, 25
Garage and Maintenance	28, 29, 30, 31, 32

These areas will be addressed in more detail below.

SPACE POWER FACILITY

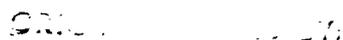
At the Space Power Facility, a risk assessment has been completed and is enclosed. This assessment was conducted according to the Ohio EPA Division of Hazardous Waste Management's "Closure Plan Review Guidance." The risk assessment concludes that the site has low enough contaminant levels that it meets the Ohio EPA criteria for a risk assessment closure and that no further action is necessary. NASA, therefore, asks that this be considered the closure plan for this area and that it be reviewed by Ohio EPA and approved by the Director.

REACTOR AND GARAGE AND MAINTENANCE AREAS

Risk assessments similar to that performed for the Space Power Facility are in the process of being finalized for the Reactor and Garage and Maintenance areas. Preliminary results indicate that existing levels of contaminants in the soil and/or groundwater do not meet Ohio EPA's risk criteria for closures at these 2 locations. Therefore, plans for further remediation of these sites will be prepared and will be submitted to the Ohio EPA as closure plans.

Please contact me at (216) 433-8852 if you have any questions regarding this or if you would like to meet to review the matters discussed here. We realize that closure plans are normally required prior to the cessation of operations at a facility; but, in this case, it wasn't until well after the units were actually closed that we learned closure plans would be required. We would appreciate your consideration in reviewing the enclosed risk assessment; we want to do whatever is necessary to ensure these sites are closed in a manner that is satisfactory to Ohio EPA.

Sincerely,



Peter W. McCallum

3 Enclosures

bcc:

2870/A. Bower
7610/W. Ice
BION/D. Easterling
BION/T. Thomas

National Aeronautics and
Space Administration

Lewis Research Center
Cleveland, Ohio
44135



Reply to Attn of: —

7630

October 16, 1990

Mr. Bruce Dunlavy, Unit Supervisor
Division of Emergency and Remedial Response
Ohio Environmental Protection Agency
Northwest District Office
1035 Devlac Grove Drive
Bowling Green, Ohio 43402-4598

Dear Mr. Dunlavy:

At Plum Brook Station near Sandusky, NASA will characterize and remediate the effects of some underground storage tanks that have been recently removed. NASA will proceed to remediate four former tank sites in the quickest reasonable time frame, thereby limiting the consequence of any environmental impacts which may have occurred.

Enclosed is the NASA Work Plan describing the planned activities to be performed at NASA's Plum Brook Station. This Work Plan represents the compilation and integration of several months of scoping and task definition by NASA, with input from Pamela Doerner and Jeffery Wander of the Ohio EPA. A brief summary of the recent activities at the four tank areas is included at the beginning of the Work Plan.

The approach described in this document was first presented to the Ohio EPA at a meeting on January 8, 1990. At the meeting, it was also decided that bringing this project "under orders" would be an inordinately time consuming endeavor, given the complexity of site usage and ownership over the years.

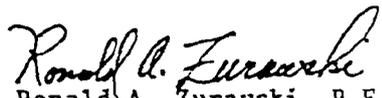
NASA requests you review and comment on this Work Plan as quickly as possible. The first phase of this proposed work has been funded, is ready to begin, and can be completed in about two months. Please give this review sufficient priority so that NASA could receive Ohio EPA feedback on the overall Plan in about four to five weeks.

At the suggestion of Mr. Wander, a copy of this Work Plan is also being sent to Mr. Harley Bowers at the Ohio EPA Central District Office. I understand that he is acting as the Ohio EPA's UST Coordinator.

NASA personnel would like to discuss this project with you at the earliest convenient time. If new EPA personnel are assigned to this NASA project, a briefing can be scheduled in the near future to provide some background on the overall site and the four particular tank areas, and to review the approach. If no changes in assigned personnel are anticipated, such a meeting may be unnecessary. However, a meeting to review and discuss the EPA comments might be the next step. I will call you in a few days to discuss your thoughts on how to proceed from here.

NASA wishes to express its desire to undertake this project quickly and proactively in coordination with the Ohio EPA. I can be reached at (216) 433-5458, at the NASA Lewis Research Center in Cleveland.

Sincerely,


Ronald A. Zurawski, P.E.
Project Manager

Enclosure

cc:

H. Bowers, Ohio EPA Central District Office

0120/J. W. Sikora
2870/A. Bower
7020/M. Hilovsky
7020/P. McCallum
7600/D. J. Keliher
7630/D. F. Larson
WOPJV/J. Park
EBASCO/R. Marnicio



State of Ohio Environmental Protection Agency

Northwest District Office

1035 Devlac Grove Drive

Bowling Green, Ohio 43402-4598

(419) 352-8461 FAX (419) 352-8468

Richard F. Celeste
Governor

cc Amy Bowser
Rec'd at DEP 11/16/90
PJM

Re: NASA Plum Brook
Erie County
DERR

November 5, 1990

Mr. Ronald A. Zurawski, P.E.
Project Manager
NASA Lewis Research Center
Cleveland, Ohio 44135

Dear Mr. Zurawski:

We have received your letter dated October 16, 1990, and the accompanying work plan for the corrective actions of the USTs that were removed from Plum Brook during July through December of 1989.

As I discussed with you during our November 2, 1990, telephone conversation, Ohio EPA regards any corrective action at the site as a voluntary effort. Therefore, this Agency cannot review, comment, recommend, or approve any work plan without a formal legal agreement between Ohio EPA and the Responsible Parties. In the absence of such an agreement, Ohio EPA reserves the right to re-enter the site and order further investigation and/or remediation. Therefore, it is in the best interest of NASA to enter into a legal agreement with OEPA and protect itself from future liability.

Please keep Ohio EPA informed of any further site investigations or remediation at this site.

If you have any questions, please feel free to contact me at (419) 352-8461.

Sincerely,

Todd Kelleher
Division of Emergency
and Remedial Response

/dlh

cc: NWDO File